

EXHIBIT C

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1 EXHIBIT 8, PLAINTIFF'S, MARKED FOR I.D.
2 Q. This exhibit may actually change your answer on the
3 last one because the date is the same, 12/21/2015; is
4 that correct?
5 A. 12/21/2015.
6 Q. And that's the same date as the previous exhibit,
7 Exhibit 7?
8 A. Yes.
9 Q. Is there an indication on this document that you saw
10 it?
11 A. Yes.
12 Q. And what does the notation indicate to you?
13 A. Bottom bunk, neck pain.
14 Q. And what is the notation from you?
15 A. Denied.
16 Q. On what date?
17 A. 12/29/15.
18 Q. And can you explain why this was denied?
19 A. It had been denied previously.
20 Q. Is there a reason why you did not request more
21 information?
22 A. I don't recall.
23 Q. Can you think of a reason why you might not have
24 requested more information on this request?
25 MR. SULLIVAN: Objection. You can

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1 answer.
2 A. I don't recall.
3 Q. Previously in your deposition, do you recall testifying
4 that you always request more information when you feel
5 like more information is needed?
6 A. Yes.
7 Q. And, so, based on looking at this document, does it
8 look like you denied it without requesting more
9 information?
10 A. Yes.
11 Q. And there is no other documentation or indication on
12 this document that would give us an explanation of why
13 it was denied without a request for further
14 information; is that correct?
15 A. That's correct.
16 Q. If this order had been approved, when would it have
17 expired? When does it state it would have expired?
18 A. 12/12/2016.
19 Q. Is there any reason why it would not have expired on
20 that date if it had been approved that you could think
21 of?
22 A. That's over a year, it is over a year.
23 Q. What is the significance of that?
24 A. Normally, any -- normally, I would not approve a
25 request that goes longer than a year without a review.

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1 I typically would pick earlier review dates. This
2 would have gone over a year, almost two years.
3 Q. If you had picked an earlier review date, how would you
4 have indicated that on the document?
5 A. I would have wrote earlier review, and I would have
6 put the date.
7 Q. And the effect of putting that on it would have meant
8 it expired on the date that you set; is that correct?
9 A. Yes.
10 MS. DAVIS: Exhibit 9, please.
11 EXHIBIT 9, PLAINTIFF'S, MARKED FOR I.D.
12 Q. Can you identify this document?
13 A. It's a special needs request.
14 Q. When is it dated?
15 A. 6/21/2016.
16 Q. By looking at this document, can you determine if you
17 ever saw it or reviewed it or approved or denied it?
18 A. No.
19 Q. Have you ever seen a request for special needs that
20 indicated multiple reasons?
21 A. In the former medical records system, yes. In the
22 current one, no.
23 Q. How come?
24 A. EMR, the electronic medical records were updated
25 from one system to another, and the old system just

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1 gave us a list of anything that has ever been requested
2 with a start date and expiration date. The new system
3 does not.
4 Q. When did the new system go into effect?
5 A. I don't recall.
6 Q. Was it after 6/21/2016?
7 A. I don't recall.
8 Q. Can I ask you to look very quickly back at Exhibit 7?
9 A. Yes.
10 Q. I'm sorry, Exhibit 8?
11 (WITNESS COMPLIES)
12 Q. Do you know if you ever consulted with any medical
13 professionals in regard to this order?
14 A. I don't recall.
15 MS. DAVIS: Exhibit 10, please.
16 EXHIBIT 10, PLAINTIFF'S, MARKED FOR I.D.
17 Q. Can you identify this document?
18 A. Yes. It is a special needs form.
19 Q. And when is it dated?
20 A. 6/28/2016.
21 Q. And what is the request for?
22 A. There are three separate requests.
23 Q. Can you explain what each request is for?
24 A. The top is bottom bunk, neck pain. Start date
25 11/12/14, stop date 12/12/16. Bottom bunk -- second